

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

BUTCH LAWS,

Plaintiff,

v.

BOBBY BROOKS,
LIEUTENANT STARLA BARRY,
TAMMY REGAN,
SERGEANT STACEY ENGLAND,
SERGEANT JOSH SMITH,
and ROBERT SEXTON,

Defendants.

CIVIL ACTION NO.: 3:20-CV-214

AFFIDAVIT OF RON HAYES

Comes now Ron Hayes, after being duly sworn and makes this oath as follows:

1. I am over the age of eighteen and competent to testify in this matter as to my own personal knowledge.
2. I am the Chief Deputy of the Claiborne County Sheriff's Office.
3. Butch Laws was an inmate housed in the Claiborne County Jail.
4. The Sheriff's Office operates the jail.
5. Review of the jail's records does not show that Mr. Laws utilized the jail's grievance procedures, let alone exhausting the process, before filing the present lawsuit.
6. Sheriff Brooks, Lieutenant Starla Barry, Tammy Regan, Sergeant Stacey England, Sergeant Josh Smith, and Robert Sexton did not violate the jail's policies and procedures governing the health and safety of the inmates.



7. The acts or omissions of Sheriff Brooks, Lieutenant Starla Barry, Tammy Regan, Sergeant Stacey England, Sergeant Josh Smith, and Robert Sexton were in compliance with the policies and procedures governing the health and safety of the inmates.

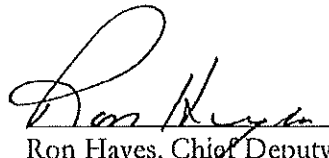
10. The acts or omissions of Sheriff Brooks, Lieutenant Starla Barry, Tammy Regan, Sergeant Stacey England, Sergeant Josh Smith, and Robert Sexton were in compliance with their training for maintaining inmate health and safety.

11. The force Robert Sexton used to maintain order and discipline during the assault committed by Mr. Laws on February 11, 2020 at approximately 1:00 a.m. was in compliance with the policies and procedures of the Sheriff's office governing use of force.

12. The force Robert Sexton used to maintain order and discipline during the assault committed by Mr. Laws on February 11, 2020 at approximately 1:00 a.m. was in compliance with his training.

13. The Sheriff's Office maintains procedures for inmates to request medical attention. Review of the jail's record does not show that Mr. Laws requested medical attention as a result of the assault he committed on February 11, 2020.

Further affiant sayeth not.


Ron Hayes, Chief Deputy Claiborne County
Sheriff's Department

SWORN TO AND SUBSCRIBED BEFORE ME this 30 day of October, 2020.


NOTARY PUBLIC

My Commission Expires: 4/22/2023

